

# **EXHIBIT 159**

to the Declaration of  
Dean M. Harvey in Support of  
Plaintiffs' Opposition Briefs

**REDACTED VERSION**

---

**From:** Bill Hoffman [Bill.Hoffman@trustedforce.com]  
**Sent:** Friday, December 19, 2008 11:10 PM  
**To:** Nguyen, Chuong  
**Subject:** RE: TrustedForce Candidate: [REDACTED]

Yikes....alright. Will you still check on the viability of [REDACTED] as a candidate? Or are you telling me that it's not likely to work. Remember, it's Christmas... 'tis the season to look out for your friendly and hard working outside recruiting agency!

**Bill Hoffman, Managing Partner**  
**TrustedForce**

1050 Connecticut Avenue, NW  
Suite 1000  
Washington, DC 20036

(202) 223-1000 – Office (Main Number)  
(202) 572-1018 - Direct Dial

(610) 639-4264 - Cell  
(509) 692-0517 - eFax  
[bill.hoffman@trustedforce.com](mailto:bill.hoffman@trustedforce.com)  
<http://www.trustedforce.com>  
*AIM: trustedforce*

**NOTICE** - This message and any attached files may contain information that is confidential and/or subject of legal privilege intended only for use by the intended recipient. If you are not the intended recipient or the person responsible for delivering the message to the intended recipient, be advised that you have received this message in error and that any dissemination, copying or use of this message or attachment is strictly forbidden, as is the disclosure of the information therein. If you have received this message in error please notify the sender immediately and delete the message.

---

**From:** Nguyen, Chuong [[mailto:Chuong\\_Nguyen@intuit.com](mailto:Chuong_Nguyen@intuit.com)]  
**Sent:** Friday, December 19, 2008 5:53 PM  
**To:** Bill Hoffman  
**Subject:** RE: TrustedForce Candidate: [REDACTED]

I should have told you about this that eBay, P&G, ADP, and Metavante we may have issues with.

---

**From:** Bill Hoffman [<mailto:Bill.Hoffman@trustedforce.com>]  
**Sent:** Friday, December 19, 2008 2:49 PM  
**To:** Nguyen, Chuong  
**Subject:** RE: TrustedForce Candidate: Osama Bedier, VP Product Development, PayPal

I have been reaching out to him for some time now and we finally connected earlier this week; so we cannot use the excuse that he approached us. You can say however that an outside agency, unbeknownst to you, established the

connection. It may not mitigate the impact completely, but it would soften the blow considerably. I really hope that Intuit will be excited to speak with him; he would be a star performer. It would be frustrating to have another Dave Fortney-esque experience! These folks are tough to dig up, as I'm sure you know.

I appreciate your sense of discretion too. We cannot afford the possibility that anyone at Intuit would discover that Osama is even thinking along these lines, until such time as he and Intuit would jointly agree to notify eBay.

Best,

B.

**Bill Hoffman, Managing Partner**

**TrustedForce**

1050 Connecticut Avenue, NW  
Suite 1000  
Washington, DC 20036

(202) 223-1000 – Office (Main Number)  
(202) 572-1018 - Direct Dial

(610) 639-4264 - Cell  
(509) 692-0517 - eFax  
[bill.hoffman@trustedforce.com](mailto:bill.hoffman@trustedforce.com)  
<http://www.trustedforce.com>  
AIM: trustedforce

**NOTICE** - This message and any attached files may contain information that is confidential and/or subject of legal privilege intended only for use by the intended recipient. If you are not the intended recipient or the person responsible for delivering the message to the intended recipient, be advised that you have received this message in error and that any dissemination, copying or use of this message or attachment is strictly forbidden, as is the disclosure of the information therein. If you have received this message in error please notify the sender immediately and delete the message.

---

**From:** Nguyen, Chuong [[mailto:Chuong\\_Nguyen@intuit.com](mailto:Chuong_Nguyen@intuit.com)]

**Sent:** Friday, December 19, 2008 5:32 PM

**To:** Bill Hoffman

**Subject:** RE: TrustedForce Candidate: [REDACTED]

This is a slightly touchy one since Scott Cook is on their board. Let me run this by the leaders here to make sure they're comfortable with me speaking to a VP at Paypal. I won't mention his name yet. The question would be did he apply to you or did you reach to him :)

---

**From:** Bill Hoffman [mailto:Bill.Hoffman@trustedforce.com]  
**Sent:** Friday, December 19, 2008 8:21 AM  
**To:** Nguyen, Chuong  
**Subject:** TrustedForce Candidate: [REDACTED]

Chuong,

I had an interesting conversation with [REDACTED] this morning. He is not looking for a new opportunity and continues to be happy at PayPal, where he been for the past six years. However, he is not opposed to the idea of making a change if it's the right situation.

He currently manages a team of 620 ppl and is directly responsible for the full lifecycle of PayPal's consumer facing, revenue producing services. This covers product management and delivery, engineering and development, QA, project management etc. When he first arrived at PayPal, his mission was to move the enterprise to next generation architectures that could support very rapid growth. Following that, he was responsible for product development and delivery internationally, then he was directed to manage the entire front end development and delivery in the U.S. before finally taking over the VP of Product Development role.

Prior to PayPal, he had Director and senior management roles at [REDACTED]. He is an excellent communicator with outstanding references. The issue for him would be whether the Intuit role would be a step back or a step forward. He said that if it were a small step back but had the real promise of producing some much larger steps forward in his career then he would be interested. Generating [REDACTED] interest in making a move to Intuit will be driven heavily by Sasan's ability to whet [REDACTED] appetite about Intuit's market strategy generally as well as the IFID division's particularly.

His current comp [REDACTED]. So, he would not come cheap, but I think he may have the kinds of technical, business and executive experience necessary to achieve Sasan and Intuit's goals. Confidentiality is critical to [REDACTED]. Scott Cook sits on eBay's Board.

[REDACTED] has not written a resume in the past ten years. Since he is a potentially great find that has only taken a small nibble at this opportunity, I told him that it would be fine to arrange the first calls with you and potentially Sasan on the basis of my notes, but if both parties chose to pursue something subsequently, a resume would be necessary. I hope that you're ok with this approach, but it was appropriate given the situation.

Please let me know if you'd like to chat with him.

Best,

Bill

**Bill Hoffman, Managing Partner**

**TrustedForce**

1050 Connecticut Avenue, NW  
Suite 1000  
Washington, DC 20036

(202) 223-1000 – Office (Main Number)

(202) 572-1018 - Direct Dial

(610) 639-4264 - Cell

(509) 692-0517 - eFax

*[bill.hoffman@trustedforce.com](mailto:bill.hoffman@trustedforce.com)*

*<http://www.trustedforce.com>*

*AIM: trustedforce*

**NOTICE** - This message and any attached files may contain information that is confidential and/or subject of legal privilege intended only for use by the intended recipient. If you are not the intended recipient or the person responsible for delivering the message to the intended recipient, be advised that you have received this message in error and that any dissemination, copying or use of this message or attachment is strictly forbidden, as is the disclosure of the information therein. If you have received this message in error please notify the sender immediately and delete the message.